

LAVIN, CEDRONE, GRAVER, BOYD & DISIPIO
Formed in the State of PA
Regina Cohen
Suite 500 190 North Independence Mall West 6th & Race Streets
Philadelphia, PA 19106
Tel: (215) 351-7551
Fax: (215) 627-2551
E-mail: RCohen@lavin-law.com
Attorney for Movant

ATTORNEY FOR MOVANT: CAPITAL ONE AUTO FINANCE, A DIVISION OF CAPITAL ONE, N.A.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN DIVISION**

IN RE:	§	CASE NO. 24-14371-JNP
	§	
DAVID PAUL CHMIELEWSKI, Debtor	§	CHAPTER 7
	§	
	§	Hearing date: July 16, 2024@11:00 A.M.
	§	
	§	<u>NOTICE OF MOTION TO VACATE</u>
	§	<u>AUTOMATIC STAY</u>

TO:

Michael I. Assad
1500 Walnut St Ste 900
Philadelphia, PA 19102

David Paul Chmielewski
31 Peters Ln C4
Blackwood, NJ 08012

Douglas S. Stanger
1810 Chapel Avenue West
Cherry Hill, NJ 08002
doug.stanger@flastergreenberg.com

U.S. TRUSTEE
One Newark Center Ste 2100
Newark, NJ 07102
USTPRegion03.NE.ECF@usdoj.gov

PLEASE TAKE NOTICE that on **Tuesday, July 16, 2024 at 11:00 A.M.**, or as soon as the matter may be heard, the undersigned, attorneys for Secured Creditor **Capital One Auto Finance, a division of Capital One, N.A.** its assignees and/or successors in interest, will move before the Honorable Jerrold N. Poslusny Jr. of the United States Bankruptcy Court, 400 Cooper Street, 4th Floor, Camden, N.J. 08101 for the entry of an *Order Vacating the Automatic Stay* with respect to Debtor's 2018 Dodge Grand Caravan Extended Passenger Van SXT 3.6L V6, V.I.N. 2C4RDGCG8JR208096, and allowing Capital One Auto Finance, a division of Capital One, N.A. to continue or institute a repossession action, by reason of the Debtor's surrender of the vehicle and failure to make regular monthly payments to Capital One Auto Finance, a division of Capital One, N.A..

Respectfully Submitted,

Lavin, Cedrone, Graver, Boyd & DiSipio
Attorney for Movant

Dated : June 24, 2024

/s/ Regina Cohen

Regina Cohen